

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LATIN MARKETS BRAZIL, LLC D/B/A/ MARKETS
GROUP,

Case No. 1-18-cv-02089-GHW-RWL

Plaintiff,

PLAINTIFF'S POST
DEPOSITION
INTERROGATORIES

-against-

PABLO OLIVEIRA,

Defendant.

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Plaintiff Latin Markets Brazil, LLC, pursuant to Federal Rule of Civil Procedure 26 and 33, and Local Civil Rule 33.3, requests that Defendant Pablo Oliveira (“Defendant”), provide written responses to the following interrogatories at the offices of Imke Ratschko, Esq, 30 Broad Street, 14th Floor, New York, New York 10004.

DEFINITIONS

As used herein, the following terms have the meaning set forth below:

1. The term “person” or “persons” mean, unless otherwise specified, any natural person, form, corporation, association, group or organization.
2. “Document” means the original and every copy, regardless of origin or location, of any correspondence, communication, e-mail, book, pamphlet, periodical, letter, memorandum, schedule, telegram, report, record, study, handwritten note, working paper, chart, graph, index, tape, disc, computer printout, data sheet or data processing card, and any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, to which you have or have had access.
3. The term “relating to”, “concerning” or “reflecting” shall mean expressing, referring to, documenting, evidencing, illustrating, describing, constituting or otherwise bearing upon in any

way.

4. The term "communication" or "communications" includes, written documents, in-person or telephone conversations, telegrams, telexes, tapes, or other sound recordings or means of transmitting information from one source to another.

5. "Exhibit A Entities" means the companies listed on Exhibit A hereto.

6. "Individual" means anyone other than Defendant performing services for, or acting on behalf of, Linkbridge Investors LLC either as an employee or contractor, including without limitation Claudio Souza, George Devolder and Naira Trazzi.

7. "Applicable Period" means September 23, 2016 to September 23, 2017.

8. "May 2018 Event" means a certain conference sponsored by Linkbridge Investors which was held in New York on May 16 and May 17, 2018.

9. "Investor Relations" means the sale to customers during the Applicable Period of products or services not involving the May 2018 Event or another conference, including without limitation the introduction of potential investors.

10. "Investor" means a "buy side" individual or entity invited to participate in a conference without paying a fee or other compensation to do so.

11. "Sponsor" means an individual or entity which pays a sponsorship fee to participate in a conference.

12. "Delegate" means an individual or entity which buys one or more individually priced tickets to participate in a conference.

INSTRUCTIONS FOR ANSWERING

1. In answering these interrogatories, furnish all information available to Defendant, including information in the possession of their attorneys, investigators and any persons or agents acting on Defendant's behalf. If you cannot answer the interrogatories in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.
2. The interrogatories that follow are to be considered as continuing and you are requested to provide, by way of supplementary answers hereto, such additional information as you or any persons acting on your behalf may hereafter obtain which will augment, clarify or otherwise modify the answers now given to these interrogatories. Such supplementary answers should be served upon counsel for Plaintiff within thirty (30) days after Defendant or their agents know, or should know, of such information.
3. Please note that all answers are to be made separately and fully and that an incomplete or evasive answer is a failure to answer. Where an interrogatory calls for an answer in more than one part, please separate the parts in your answer accordingly so that each part is clearly set out and understandable.
4. If you have only incomplete knowledge of the answer to an interrogatory, please answer to the extent of your knowledge and state specifically what part or area of the interrogatory you have only incomplete knowledge of and identify the person(s) who does or might have additional knowledge or information to complete the answer.
5. You may answer any interrogatory in whole or in part by attaching a document(s) that contains information sufficient to do so.

INTERROGATORIES

INTERROGATORY NO.1:

Please set forth which Exhibit A Entities were contacted by you or by any Individual during the Applicable Period.

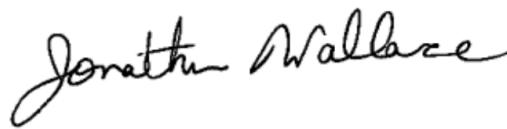
INTERROGATORY NO.2:

Please set forth with regard to any Exhibit A Entity which you or any of the Individuals contacted during the Applicable Period, the following information: a. the date on which you or any Individual first contacted any Exhibit A Entity; b. The name of the person contacted; c. The means by which the Communication took place; d. whether such Communication was in connection with the May 2018 Event, Investor Relations, or some other matter, in which case, set forth the other matter; e. whether such Exhibit A Entity signed any contracts pertaining to the May 2018 Event; f. whether such Exhibit A Entity paid any money in connection with the May 2018 Event; g. whether such Exhibit A Entity attended the May 2018 Event; h. whether such Exhibit A Entity was an Investor, Sponsor or Delegate with regard to the May 2018 Event.

INTERROGATORY NO.3:

Please attach any Documents which you consulted in preparing your responses to Interrogatory 2 above, or which contain any information relating thereto.

Dated: New York, New York
March 21, 2019



Jonathan Wallace, Esq.
30 Broad Street, 14th Floor
New York, NY 10004